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7 *Attorneys for Google LLC*

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF NIMA HEFAZI IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF ITS PATENT
SHOWDOWN CORRECTED MOTION
FOR SUMMARY JUDGMENT**

1 I, Nima Hefazi, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLP representing
4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under
7 Seal Portions of its Patent Showdown Corrected Motion for Summary Judgment (“Motion”). If
8 called as a witness, I could and would testify competently to the information contained herein.

9 3. Google seeks an order sealing the materials as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Google’s Corrected Motion	Portions highlighted in green	Google

13 4. Google’s Corrected Motion contains references to Google’s confidential business
14 information and trade secrets, including details regarding source code, architecture, and technical
15 operation of Google’s products and functionalities that Sonos accuses of infringement. The
16 specifics of how these functionalities operate is confidential information that Google does not share
17 publicly. Thus, public disclosure of such information could lead to competitive harm to Google as
18 competitors could use these details regarding the architecture and functionality of Google’s products
19 to gain a competitive advantage in the marketplace with respect to their competing products. I also
20 understand that a less restrictive alternative than sealing this motion would not be sufficient be-
21 cause the information sought to be sealed is Google’s confidential business information and trade
22 secrets but is necessary to Google’s Motion.

23 I declare under penalty of perjury under the laws of the United States of America that to the
24 best of my knowledge the foregoing is true and correct. Executed on April 24, 2022, in Los Angeles,
25 California.
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1 DATED: April 24, 2022

2 By: /s/ Nima Hefazi
3 Nima Hefazi

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15 **ATTESTATION**

16 I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the
17 above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has
18 concurred in the aforementioned filing.

19
20 DATED: April 24, 2022

21 /s/ Charles K. Verhoeven
22 Charles K. Verhoeven